

CCL *1107*

CCL Custom Manufacturing, Inc.

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April 17, 1995

Donald E. Sutton P.E.
Manager, Permit Section
Division of Air Pollution
ILEPA
2200 Churchill Rd.
Springfield, Illinois 62794-9276

RECEIVED
MAYWOOD OFFICE

APR 26 1995

ILEPA/DAPC
STATE OF ILLINOIS

Dear Donald,

This communication is to fulfill the requirements of 35 Ill. Adm. Code Part 218 regarding methods of emission controls for CCL Custom Manufacturing, Niles Plant. ID number for the plant is 031201ACM.

Response to:

Section 218.692 (b)(1), A&B and 218.692 (c)(1) A

As of 3/15/95 all aerosol filling lines at the CCL Niles plant were compliant with RACT by means of filling cans and all high pressure pumps were compliant by means of work practices. CCL Niles is currently operating the following production lines and associated pumps and filling equipment.

<u>Line No.</u>	<u>U.T.C.</u>	<u>I.T.V.</u>	<u>Wheatley</u>
#4	K.P. U.T.C. Model #1952-92-9R Serial #358		Model #P32 Serial #8479
#6	K.P. U.T.C. 9 head	K.P. P/G 15 Head	Model #P-323 Serial #8489
#8	K.P. U.T.C. Model #952-96-9R1 Serial #350		Model #P-200A Serial #95259A
#9	K.P. U.T.C. 9 Head	K.P. P/G 15 Head	Model #P-328 Serial #15622
#11	K.P. U.T.C. Model #7352-12 Serial #113	K.P. P/G Model #74651-16 Serial #7126	Model #P-323 Serial #12271

All UTC filling equipment was equipped during 2/95 with sequencing springs in order to accomplish enhanced UTC filling.

218.692 (b)(1) C

Propellant losses are based upon emission testing done by Almeega Corporation in 1989 on which data our current permit is based.

218.692 (b)(1) D

CCL Niles has committed to and is filling all cans capable of being filled TTV by TTV. A sample of the evaluation form that was used to evaluate all current products is included as Attachment 1. Production records (operating data) required under 218.692 (b)(3) have been routine records and are available at the plant for review.

218.692 (c)(1) B&D

Work practices for the high pressure booster pumps is being managed by a documented preventative maintenance program. An example of the maintenance log/preventative maintenance program is included as Attachment 2.

Sincerely,



Dale M. Cook
General Manager, Niles Facility

DMC/ssm

TTV EVALUATION FORM

CUSTOMER: _____

PRODUCT: _____

CAN TYPE (ALUMINUM/TINPLATE): _____

CAN SIZE: _____

VALVE MODEL: _____

STEM/ORIFICE SIZE: _____

BUTTON (ON/OFF): _____

PROPELLANT USED: _____

PROPELLANT WEIGHT: _____

IS VALVE, AS IS, ADAPTABLE TO TTV FILLING: _____

UTC OPERATING RATE: _____

ESTIMATED TTV OPERATING RATE: _____

DOES TTV FILLING IMPACT PRODUCT PERFORMANCE: _____

FACILITY REVIEW DATE

TECHNICAL REVIEW DATE

WHEATLEY PUMP PREVENTIVE MAINTENANCE PROGRAM

Purpose: These pumps have been designed to simplify maintenance and make service easy. The use of Preventive maintenance and predictive replacement of parts will insure us of minimal upsets before serious troubles can occur, thus helping to reduce emissions and operating expenses.

DAILY MAINTENANCE

Initial

Date

- Check the level of the crankcase lubricating oil.
- Check seals
- Check for leaks around gaskets, pistons, and all connections
- Check plunger for signs of grooves or damage
- Keep pump clean
- Check the stuffing box unit for tightness

MONTHLY MAINTENANCE

Initial

Date

- Wash or change crankcase filter.
- Inspect pump valves for sign of wear.
- Check valve springs for wear
- Check seat face for uniform wear
- Replace packing on pistons with Garlock packing Style 5000 size 3/8"
- Check for leaks around gaskets, pistons, and all connections
- Check the level of the crankcase lubricating oil.
- Check plunger for signs of grooves or damage
- Keep pump clean
- Check Crankshaft bearings and connecting rod wrist pins for excessive play
- Tighten all studs, nuts, and capscrews.

16 WEEK MAINTENANCE CYCLE

Initial

Date

- Replace pump plungers
- Replace pump seals
- Wash or change crankcase filter.
- Inspect pump valves for sign of wear.
- Check valve springs for wear
- Check seat face for uniform wear
- Check for leaks
- Check the level of the crankcase lubricating oil.
- Keep pump clean

DAILY MAINTENANCE WHEATLEY PUMPS

DAILY MAINTENANCE

Line	Date and Shift	Mechanic
1. Check the level of the crankcase lubricating oil. Replenish as needed. List any additions.		
2. Check seals for leaks. Note any adjustments/repairs.		
3. Check gaskets, pistons and connections for leaks. Note any adjustments or repairs needed/completed. Also note any leaks found.		
4. Check plungers for signs of grooves or other damage.		
5. Make sure pump is clean.		
6. Check stuffing box unit for tightness.		

Mechanic doing daily maintenance is responsible for filling in date and initialing the functions completed on the day it is done. This is a government mandated program. Failure to fill out the sheets properly, or falsification of data, is grounds for immediate dismissal.